



in Seattle, WA which makes the two parties' citizens of different states and the amount *in controversy* exceeds \$75,000. Specifically, Dora L. Adkins resides in Fairfax County with a mailing address of P.O. Box 3825, Merrifield, VA 22116 and the Defendant, Starbucks Corporation's Principal Office is located at 2401 Utah Ave S Ste 800, MS:S-LA1, Seattle, WA, 98134 - 1435, USA. (EXHIBIT #1: See, Copy of Business Entity Details for Starbucks Corporation, Proof of Diversity). The Diversity of citizenship between the Plaintiff, Dora L. Adkins and the Defendant, Starbucks Corporation is completely different; as well as the amount *in controversy* is for \$350,000 Dollars and this Honorable Court holds jurisdiction over the Complaint.

Plaintiff is asking for in Count I: Intentional Infliction of Emotional Distress – Three Hundred Million Dollars and a Claim for Punitive Damages – Three Hundred Million Dollars. The *in-controversy* amount for Punitive Damages is \$350,000. As a matter of law, Plaintiff established she has suffered an extreme & debilitating injury of emotional distress damages that satisfy the \$75,000 amount *in controversy* limit. Virginia cap on punitive damages. ... Virginia statute § 8.01-38.1 places a cap of \$350,000 on punitive damages courts may award to punish wrongdoers. Plaintiff will use the Virginia cap on punitive damages to meet the \$75,000 requirement for the amount *in controversy* limit.

**INTRODUCTION TO PRIMA FACIE CASE:**

1. Plaintiff entered a Contract through and by the accommodations provided by Starbucks Corporation owner and operator of the Starbucks located in Northern Virginia; Woodbridge, VA; Richmond, VA. (EXHIBIT #3: See, Copies of Contract Agreement Between Plaintiff, Dora L. Adkins and Defendant, Starbucks, Dated, October 2020 through May 2020, in the form of Receipts for Plaintiff's purchases of food and drink from Starbucks.

**PRIMA FACIE CASE:**

**FACTS OF THE COMPLAINT:**

1. PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD POISONING: Plaintiff have been intentionally targeted for food poisoning by the Defendant, Starbucks Corporation approximately 250-times. The Plaintiff have been extremely and severely emotionally distressed; with severe & debilitating physical pain suffered in Plaintiff's stomach that caused a severe of over production of saliva resulting in nausea, violent vomiting, headache, and debilitating stomach pain including itching and swelling inside the stomach. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination; Copy of Email Sent to Kevin Johnson, CEO of the Starbucks (failed email attempt) and/or Letter Mailed to Kevin Johnson, Copied and Pasted Below; Paragraph sent to the District Court on

September 14, 2020 Regarding being Food Poisoning and/or having Plaintiff's food contaminated; Email sent to Three District Managers for Starbucks)))))).

VIA FAX (206-682-7570) AND U.S. MAIL

Dora Adkins  
P.O. Box 3825  
Merrifield, VA 22116  
[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)

October 13, 2020

Kevin Johnson, CEO  
Starbucks Coffee Company  
2401 Utah Avenue South  
Seattle, WA 98134-1436  
206-447-1575  
206-682-7570  
@juniper.net  
@starbucks.com  
@microsoft.com

Dear Mr. Johnson:

This letter is regarding being allegedly food poisoned and/or having my food contaminated at EVERY Starbucks Restaurants that I have purchased food and/or drink over the past 2-years and perhaps even longer.

Next to my last visit at a Starbucks located in Reston, Virginia, I was extremely hungry and ordered two Breakfast Sandwiches. The employee who took my order was both working the register and completing the preparation of the customer's order without plastic gloves and/or the washing of her hands between the use of the register and the oven. There was also another employee working directly at the oven without plastic gloves. I stood nearby and did not go to the end to pick up my order. The employee threw out two orders into the trash can that were pastries and before placing my orders into the oven used his cell telephone. He placed his cell telephone directly on the counter where the food is prepared and did not put the cell telephone away before providing me the two separate orders of a Bacon,

Gouda & Egg Sandwich and a Sausage, Cheddar & Egg. I ate the two Breakfast Sandwiches and had an extreme and debilitating stomachache afterward.

No sooner than I could walk to my vehicle parked nearby and drove away, the employee who waited on me at Starbucks was outside smoking a cigarette and saw me as I drove off.

The last visit was to a Starbucks located in Herndon, VA. It was pretty much the same as my visit to the Starbucks located in Reston, VA. There was one employee wearing plastic gloves handling both the customer's order at the register and the preparation at the oven but did not wash her hands and/or change her plastic gloves. There was another employee cleaning up with a brush and handled and was seen touching many surfaces; before I knew it, she had gone to the back and out of my sight. When I became next in line, the two employees had switched positions and that was when my breakfast sandwich allegedly became contaminated. I paid with money and the employee who had been cleaning did not wash her hands after the handling of the money I paid with and returned to handling of items. I again had an extreme and debilitating stomachache after consuming the Bacon, Gouda & Egg Sandwich and had to use foods to get rid of the food poisoning.

In a time before these two visits, a chemical got on my Sausage, Cheddar & Egg Breakfast Sandwich and caused immediate severe vomiting and an extreme and debilitating stomachache.

I can be best reached by my email address: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)

Sincerely,

Dora Adkins

\*\*\*\*\*

CONFIDENTIAL EMAIL REGARDING FOOD POISONING AND/OR FOOD  
CONTAMINATION

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)

jemiller@starbucks.com <jemiller@starbucks.com>;  
To: susander@starbucks.com <susander@starbucks.com>;  
rlomax@starbucks.com <rlomax@starbucks.com>

Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Date: Sun, Nov 1, 2020 10:44 am

November 1, 2020

Dear Ms. Miller, Ms. Sanderson, & Mr. Lomax:

This **confidential** email is out of an emergency because allegedly the food I purchased from **EVERY** Starbucks store is poisoned and/or contaminated.

I received Ms. Miller's business card on Friday, October 30, 2020 after I went into a Starbucks store and the employee who prepared my Breakfast Sandwich allegedly contaminated my Breakfast Sandwich with a cleaning rag that was being used simultaneous as my Breakfast Sandwich was prepared. I had a severe stomachache; headache; saliva thickening as in most of the purchases of food from Starbucks. One similar instance; whereby, the employee for Starbucks cleaning with a cleaning rag went directly to the preparation of my Breakfast Sandwich, I reported the problem to the Store Manager for Starbucks.

Sincerely,

Dora Adkins

**NOTE:** I labeled this email confidential because I do not want to become a target for the report.

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“On September 14, 2020, Plaintiff wrote the following in an unrelated District Court pleading: “Plaintiff after allegedly eating at McDonald’s contracted

Rings Worms and in a separate incident after eating at Starbucks allegedly was poisoned with a chemical placed on Plaintiff's Breakfast Sandwich. All Proof that GOD is still intervening on Plaintiff's behalf."

2. **PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD POISONING.** Provided are the facts how GOD is directly involved with the Plaintiff and has been in EVERY incident of food contamination and/or food poisoning directed towards the Plaintiff: 1) Plaintiff through observation knows EVERY detail of who the alleged Starbucks employees are and when the food contamination and/or food poisoning occurred.

3. **PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD POISONING:** The alleged Starbucks employees premeditated this crime because it occurs on Plaintiff's EVERY visit. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination).

4. **PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD POISONING:** The Defendant, Starbucks conduct of food contamination and/or food poisoning of the Plaintiff MUST cease. Plaintiff wants to live free of food poisoning. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination).

5. **PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD**



**POISONING:** The Coronavirus and other diseases are directly connected to the issues Plaintiff raised in this Complaint. It is Plaintiff's belief most of these serious issues will go away once Plaintiff prevail and begin GOD'S work. Plaintiff have been food poisoned continuously, meaning EVERYDAY and/or EVERY MEAL. It is not known to Plaintiff why Plaintiff has the ability through GOD to know when Plaintiff is food poisoned.

- a. The alleged Starbucks' employees BEFORE the Coronavirus NEVER wash his or her hands before the preparation of the customer's order.
- b. The alleged Starbucks' employees BEFORE the Coronavirus handled the customer's personal cups and/or containers without washing his or her hands before proceeding to the next's customer.
- c. The alleged Starbucks' employees BEFORE the Coronavirus allow for personal hygiene and the safety of food to be overlooked by having several employees handling one's order; thereby, the customer cannot know when the safety problem occurred.
- d. The alleged Starbucks' employees BEFORE the Coronavirus were not using and/or required to use plastic gloves for the Health and Safety of its customers.



- e. The alleged Starbucks' employees AFTER the Coronavirus continued to worsen severely with use of just the drive through windows for pick-up, when the inside of the Starbucks Restaurant was closed.
- f. The alleged Starbucks' employees AFTER the Coronavirus continued to worsen with use of just the drive through the window for pick-up when money was used by the customer and the same employee handled the food items purchased without washing his or her hands and/or the change of plastic gloves.
- g. The alleged Starbucks' employees AFTER the Coronavirus continued to worsen when the Starbucks opened the inside of its Restaurants because the employee working the register is still preparing customer's food without washing of the hands.
- h. The alleged Starbucks' employees AFTER the Coronavirus continued to use his or her cell telephone while handling the customer's food and drink.
- i. The alleged Starbucks' employees AFTER the Coronavirus continued to go from cleaning and/or sweeping the floor to preparing the customer's food and drink before following Health and Sanitary measures of washing his or her hands and placing on plastic gloves.

- j. The alleged Starbucks' employees AFTER the Coronavirus continued to not use plastic gloves appropriately by disposing of the plastic gloves after use and/or the inconsistency of not wearing plastic gloves at all.
- k. The alleged Starbucks' employees AFTER the Coronavirus continued to go from cleaning to preparing the customer's food and drink before following Health and Sanitary measures of washing his or her hands first and then applying clean gloves. Placing clean gloves on dirty hands is not following Health and Sanitary measures.
- l. The alleged Starbucks' employees AFTER the Coronavirus are not properly wearing a Mask with some instances of not having the nose completely covered.

6. PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD

POISONING: Provided are other facts how GOD is directly involved with the Plaintiff and has been in EVERY incident of food contamination and/or food poisoning directed towards the Plaintiff. Plaintiff cannot and will not file suit against all the Restaurants; Grocery Stores and Hotels & Restaurants; and/or any place selling and serving food and drink, but the changes are needed immediately. For example, Plaintiff allegedly experienced food contamination and/or food poisoning at Starbucks that was on the list of 282 cases and on March 3, 2020 the

Starbucks Corporation is just now identifying a major Health risk of allowing customers to return to the counters of their stores with the customer's used container for re-fills of coffee. Plaintiff have fallen severely ill from consumption from Starbucks several times from allegedly Health Violations practices that caused food contamination and/or food poisoning to the Plaintiff by the Starbucks Corporation. The fact that Plaintiff have died from food contamination and/or food poisoning is proof through GOD'S DEVINE INTERVENTIONS that GOD is using Plaintiff to bring about change as discussed in the case of *Dora L. Adkins v. Chipotle Mexican Grill of Colorado, LLC*. GOD is disappointed that through and by GOD'S guidance Plaintiff have not prevailed in any lawsuit to move forward and to do GOD'S work. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination).

7. PRIMARY CLAIMS OF FOOD CONTAMINATION AND/OR FOOD POISONING: Plaintiff hold no degrees in restaurant and culinary management; nor any degrees in Health and Medicine; nor studied any food safety laws; yet the knowledge is clearly there in all three areas and many more. But the ability to know and see the food contamination and/or food poisoning as it is unfolding rests solely and completely with GOD. All the incidents of food poisoning and food contamination cause Plaintiff to suffer severe fear of any food and/or drink consumption and is causing a problem such as malnutrition.

**COUNT #1: ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

**ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

- Extreme or outrageous conduct that
- Intentionally or recklessly causes
- Severe emotional distress (and possible also bodily harm)

**FACTS TO SUPPORT THE ELEMENTS OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

**Extreme and Outrageous Conduct:**

8. Plaintiff realleges paragraphs 1 through 7 as though fully set forth herein.
9. Defendant, Starbucks Corporation alleged behavior constitutes extreme and outrageous conduct when it allegedly intentionally and recklessly caused the following: Plaintiff have been intentionally targeted for food poisoning by the Defendant, Starbucks Corporation over 250-times. The Plaintiff have been extremely and severely emotionally distressed; physical harmed and/or injured with a severe over production of saliva resulting in nausea, violent vomiting, headache, and debilitating stomach pain including itching and swelling inside the stomach which is affecting Plaintiff's main organs. Defendant, Starbucks Corporation, alleged behavior constitutes extreme and outrageous conduct when it allegedly intentionally and recklessly continued the deadly behavior BEFORE and AFTER the Coronavirus Pandemic.

10. Defendant, Starbucks Corporation alleged behavior constitutes extreme and outrageous conduct when allegedly Starbuck Corporation discontinued the highly transmission of germs and disease of allowing its employees handle used customer's coffee cups and personal containers.

11. Defendant, Starbucks Corporation alleged behavior constitutes extreme and outrageous conduct when allegedly Starbuck Corporation fail to understand and follow the CDC guidelines as it relates to personal hygiene of its employees which are passed on to its customers.

12. Defendant, Starbucks Corporation alleged behavior constitutes extreme and outrageous conduct when allegedly Starbuck Corporation fail to understand and follow the CDC guidelines as it relates to properly wearing Masks to completely cover the nose and the mouth.

13. All of the elements for Intentional Infliction of Emotional Distress were met by the facts in the Complaint when Defendant, Starbuck Corporation through continuing contract for accommodations with the Plaintiff attempted premeditated murder through and by food contamination and/or food poisoning of the Plaintiff. The FACTS, PROOF AND EVIDENCE proves that the Intentional Infliction of Emotional Distress was caused to the Plaintiff by the Defendant, Starbucks Corporation.

“Liability has been found only where the conduct has been so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of

decency, and to be regarded as atrocious, and utterly intolerable in a civilized community. Generally, the case is one in which the recitation of the facts to an average member of the community would arouse his resentment against the actor, and lead him to exclaim, "Outrageous!"

**Intent/Recklessness:**

14. Plaintiff realleges paragraphs 1 through 7 as though fully set forth herein.

In addition, to acting in an extreme and outrageous manner, Defendant, Starbucks Corporation acted with intent or recklessness when it allegedly targeted the Plaintiff for food contamination and/or food poisoning.

“Regarding the second element, Plaintiff established actual or proximate causation or the requisite level of intentionality or recklessness.”

15. Defendant, Starbucks Corporation acted with intent or recklessness because Starbucks Corporation intentionally targeted the Plaintiff for food poisoning approximately 250-times and/or EVERY time Plaintiff is a customer at ANY Starbucks. The list involving food poisoning and food contamination at Starbucks was compiled in March of 2020 and/or 8-months ago and since that time Plaintiff added Starbucks location whereby Plaintiff was targeted for food poisoning and/or food contamination. Plaintiff also noted that Plaintiff to prevent starvation, Plaintiff repeated her purchases at the same Starbucks more than the one time listed below which proves the approximately 250-times:

1) STARBUCKS, Vienna, VA (CLOSED)

- 2) STARBUCKS, Vienna, VA (CLOSED)
- 3) STARBUCKS, Vienna, VA
- 4) STARBUCKS, Fairfax Oaks, VA
- 5) STARBUCKS, Fairlakes, Fairfax, VA
- 6) STARBUCKS, Fairlakes, Fairfax, VA
- 7) STARBUCKS, Vienna, VA
- 8) STARBUCKS, Vienna, VA
- 9) STARBUCKS, Oakton, VA
- 10) STARBUCKS, Fairfax, VA
- 11) STARBUCKS, Fairfax, VA
- 12) STARBUCKS, Fairfax, VA
- 13) STARBUCKS, Stafford, VA
- 14) STARBUCKS, Arlington, VA
- 15) STARBUCKS, Herndon, VA
- 16) STARBUCKS, Herndon, VA
- 17) STARBUCKS, Chantilly, VA
- 18) STARBUCKS, Arlington, VA
- 19) STARBUCKS, Alexandria, VA, Van Dorn
- 20) STARBUCKS, Alexandria, VA, Duke Street
- 21) STARBUCKS, Alexandria, VA, Route 1
- 22) STARBUCKS, Alexandria, VA
- 23) STARBUCKS, Alexandria, VA (Near Alexandria March Center Hotel)
- 24) STARBUCKS, Falls Church, VA
- 25) STARBUCKS, Falls Church, VA (CLOSED)
- 26) STARBUCKS, Falls Church, VA
- 27) STARBUCKS, Falls Church, VA
- 28) STARBUCKS, Herndon, VA
- 29) STARBUCKS, Fredericksburg, VA
- 30) STARBUCKS, Arlington, VA
- 31) STARBUCKS, Annandale, VA
- 32) STARBUCKS, Tysons I, Vienna, VA
- 33) STARBUCKS, Tysons II, Vienna, VA
- 34) STARBUCKS, Reston, VA
- 35) STARBUCKS, Reston, VA
- 36) STARBUCKS, Reston, VA
- 37) STARBUCKS, Richmond, VA



- 38) STARBUCKS, Richmond, VA
- 39) STARBUCKS, Herndon, VA (CLOSED)
- 40) STARBUCKS, Alexandria, VA, Old Towne
- 41) STARBUCKS, Fairfax, VA (Nutley)
- 42) STARBUCKS located inside CROWNE PLAZA HOTEL, Herndon, VA
- 43) STARBUCKS located inside WESTIN HOTEL, Arlington, VA Ballston Commons
- 44) STARBUCKS located inside HARRIS TEETER, Falls Church, VA
- 45) STARBUCKS located inside SAFEWAY, Annandale, VA
- 46) STARBUCKS located inside SAFEWAY, Kingstown Alexandria, VA
- 47) STARBUCKS located inside SAFEWAY, Falls Church, VA
- 48) STARBUCKS located inside HILTON HOTEL, Old Towne Alexandria, VA
- 49) STARBUCKS located inside WESTIN HOTEL, Alexandria, VA, Carlyle
- 50) STARBUCKS located inside GIANT, Alexandria, VA Duke Street
- 51) STARBUCKS located inside GIANT, Fairfax, VA
- 52) STARBUCKS, Alexandria, VA, Kingstown
- 53) STARBUCKS, Alexandria, VA Carlyle (CLOSED)
- 54) STARBUCKS, Alexandria, VA Carlyle
- 55) STARBUCKS, Alexandria, VA (By Alexandria Circuit Court)
- 56) STARBUCKS, Alexandria, VA Bradlee Center
- 57) STARBUCKS located inside HYATT REGENCY HOTEL, Tysons Corners I, Shopping Center, VA
- 58) STARBUCKS, Roselyn, VA
- 59) STARBUCKS, Fairfax, VA Campus, George Mason University
- 60) STARBUCKS, Georgetown University
- 61) STARBUCKS, Roselyn, VA
- 62) STARBUCKS, Merrifield, VA
- 63) STARBUCKS, Merrifield, VA (CLOSED)
- 64) STARBUCKS, Dunn Loring, Merrifield, VA
- 65) STARBUCKS, Dumfries, VA
- 66) STARBUCKS, Arlington, VA Ballston Commons
- 67) STARBUCKS, Arlington, VA
- 68) STARBUCKS, Arlington, VA Courthouse Arlington
- 69) STARBUCKS, McLean, VA

70) STARBUCKS, Glenn Allen, VA

16. Defendant, Starbucks Corporation acted with intent or recklessness because NO customer and/or person wants to be targeted; especially, the Plaintiff. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination).

17. Defendant, Starbucks Corporation acted with intent or recklessness because its Health and Sanitary measures have not changed BEFORE and AFTER the Coronavirus Pandemic.

18. Defendant, Starbucks Corporation acted with intent or recklessness because while food and drink has not been connected to the Coronavirus Pandemic; Plaintiff have died from food poisoning and/or from having her food contaminated. And, before it is asked Plaintiff relived through GOD'S Devine Interventions.

19. Defendant, Starbucks Corporation acted with intent or recklessness when it allegedly caused the Plaintiff to be in a helpless state of facing malnutrition.

20. Defendant, Starbucks Corporation acted with intent or recklessness because Starbucks Corporation allegedly caused Plaintiff to go without food because of complete and total fear of dying of food poisoning.

21. Defendant, Starbucks Corporation acted with intent or recklessness

when it allegedly targeted the Plaintiff to bring about extreme physical and emotional harm.

**Severe Emotional Distress:**

29. Plaintiff realleges paragraphs 1 through 7 as though fully set forth herein.

30. In the Plaintiff's claim for Intentional Infliction, the Plaintiff's Emotional Distress in response to extreme and outrageous behavior reached a "severe" level. The Plaintiff can prove an injury that the Emotional Distress she experienced reached a sufficient level of severity, which justifies an award for Intentional Infliction against the Defendant, Starbucks Corporation.

31. Plaintiff did not realize the gravity of the injuries of the physical and emotional distress because the actions are just unimaginable.

32. The intensity and duration of the emotional distress also contribute to Plaintiff's severity, in that, she become bed-ridden and/or out of commission when Plaintiff suffered the food contamination and food poisoning.

33. Defendant, Starbucks Corporation alleged "wrongdoer had specific purpose of inflicting emotional distress or where he intended his specific purpose of inflicting emotional distress would likely result," because of the following reasons: Plaintiff suffered the food contamination and food poisoning at EVERY purchase of food and drink from Starbucks. (EMAILS #1; #2; #3; #4; #5;

#6: *See*, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination and Email Sent to Three District Managers, EMAIL & REPLY #7; #8:)).

“Defendant, Starbucks Corporation alleged conduct “goes beyond all possible bounds of decency and is regarded as atrocious and utterly intolerable in a civilized community.”

34. Defendant, Starbucks Corporation alleged “liability has been found where the conduct has been so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized society,” because of the following reasons: Plaintiff wants to eat at any Starbucks without having her food contaminated and/or poisoned that caused physical injuries and emotional injuries.

35. Defendant, Starbucks Corporation alleged “liability arises only when the emotional distress is extreme, and only where the distress inflicted is so severe that no reasonable person could be expected to endure it,” because Plaintiff become totally and completely bedridden and unable to function and lately in tears from fear of death from not eating and nourishing the body properly.

36. In the Plaintiff’s claim for Intentional Infliction, the Plaintiff’s Emotional Distress in response to extreme and outrageous behavior reached a "severe" level because Plaintiff no matter how many times food poisoned do not

understand the Defendant, Starbucks Corporation criminal actions against the Plaintiff.

“As more fully described above specifically in the Emails sent to Self, Defendant, Starbucks Corporation alleged actions and conduct did directly and proximately cause severe emotional distress to Plaintiff, and thereby constituted intentional infliction of emotional distress.”

“Plaintiff has alleged facts supported by the Facts, Proof and EVIDENCE give rise to a reasonable inference that Defendant, Starbucks Corporation’s conduct sufficiently supports a theory of IIED.”

**PUNITIVE DAMAGES CLAIM:**

37. Plaintiff realleges paragraphs 1 through 7 as though fully set forth herein.

38. Defendant, Starbucks Corporation misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of Plaintiff when it targeted Plaintiff and further committed a crime when it targeted Plaintiff’s food and/or intake.

“As a direct and proximate result of the actions as described above, Plaintiff sustained actual damages including over production of saliva resulting in nausea, violent vomiting, headache, and debilitating stomach pain including itching and swelling inside the stomach; and repeatedly grievous mental and emotional suffering that the poisoning could cause disease.”

39. The actions by the tortfeasors were malicious to the degree of being criminal in such because Plaintiff did not pay to have her food contaminated with poisoning. Plaintiff wants to order food of Plaintiff’s choosing without the

worry of food poisoning and/or food contamination or having to watch EVERY move made by the employee as direct evidence through Number 5(a-l) and/or for 8-months during the COVID-19 Pandemic. (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination)).

40. Defendant, Starbucks Corporation acted wantonly, oppressively with its misconduct or actual malice or recklessness when the contract for accommodations in the Defendant, Starbucks Corporation was breached to the point of causing non-stop physical and emotional injuries. Plaintiff suffered an enormous amount of extricating physical pain from over production of saliva resulting in nausea, violent vomiting, headache, and debilitating stomach pain including itching and swelling inside the stomach; and severe emotional pain to the point of not functioning. (EXHIBIT #2: See, Copy of Letter Mailed to Kevin Johnson, CEO EMAIL AND/OR LETTER: EMAIL #8; (EMAILS #1; #2; #3; #4; #5; #6: See, Copies of Emails Sent to Self-Regarding Food Poisoning and/or Food Contamination)).

41. Plaintiff reported the horrific crime of intentional targeting by food poisoning and/or food contamination to Kevin Johnson, CEO on October 13, 2020, but was unable to send Mr. Johnson an email. (EMAIL #8: See, Copy of

Email and/or Letter Sent to Kevin Johnson, CEO of the Starbucks (failed email attempt).

42. Plaintiff reported the horrific crime of intentional targeting by and through food poisoning and/or food contamination to three District Managers by Email and ONLY one of the three District Managers had the decency to send a reply. (EMAIL #7: See, Copy of Email Sent to Three District Manager and the Reply from one District Managers for Starbucks). Plaintiff also reported the problem of injuries to three Managers located inside the Starbucks Restaurant; twice at the Starbucks located off of Van Dorn, Alexandria, VA and another incident to the Manager for the Starbucks, located in Vienna, VA across from BB&T.

43. Starbucks horrific actions cause the Plaintiff to be without food to purchase to consume and contribute to Plaintiff's malnutrition.

TO SELF REGARDING TRIP TO STARBUCKS LOCATED IN RESTON, VA ON SUNDAY, NOVEMBER 15, 2020

From: doraadkins7@aol.com  
To: DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
Date: Sun, Nov 15, 2020 3:01 pm

**EMAIL TO SELF REGARDING TRIP TO STARBUCKS LOCATED IN RESTON, VA ON SUNDAY, NOVEMBER 15, 2020**

November 15, 2020

I went into the Starbucks located in Reston, VA very hungry. The employee was handling something and had just worked on the cash register. I had to request that the employee wash her hands after she had



taken my order for two Breakfast Sandwiches and provided a receipt to me. The employee was going directly to the refrigerator to get the two breakfast sandwiches without washing her hands. The employee did not appreciate being asked to wash her hands, so she left the right hand **COMPLETELY WET** with water dripping off the right hand. I stated that I was not in a hurry and that I could wait for her to completely dry her hands, and she did.

The employee then was going to the back of the kitchen to get a Sausage Breakfast Sandwich and I **IMMEDIATELY STATED I WOULD TAKE TWO GOUDA BREAKFAST SANDWICHES BECAUSE IT HAS HAPPENED TOO OFTEN THAT ALLEGELY HER HANDS WOULD BECOME CONTAMINATED WHEN SHE WENT TO THE BACK OF THE KITCHEN to allegedly retrieve a Sausage Breakfast sandwich so I took two Gouda Breakfast Sandwiches.**

**The employee knows better because a couple came up while I was waiting on the sandwiches to warm in the oven and the employee WASHED HER HANDS AFTER USING THE CASH REGISTER.**

I thanked her and left the Starbucks store.

**WHEN WILL IT STOP!!! WHY IS THERE A NEED TO HARM A CUSTOMER WHO CONTIBUTES TO YOUR SALARY!!!**

**THIS INCIDENT AND OTHER INCIDENTS PROVIDES PROOF THAT ALLEGEDLY THE GM, Mr. Johnson nor the three District Managers have provided training to its Starbucks employees as it relates to Food Safety for the HEALTH AND SAFETY OF ITS CUSTOMERS.**

**I DO KNOW TO NEVER ALLOW AN EMPLOYEE TO LEAVE MY EYESIGHT TO RETRIEVE ANYTHING FROM THE KITCHEN.**

Sincerely,

Dora Adkins

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The alleged facts contained in the Complaint are punitive in EVERY sense of the word because Plaintiff have reported the SERIOUS problem to approximately six different managers and to the CEO, Kevin Johnson for Starbucks.

WHEREFORE, this Plaintiff claims SIX-HUNDRED MILLION DOLLARS and whatever else this Honorable Court deems appropriate.

Respectfully Yours,



Dora L. Adkins, *pro se*

ADDENDUM

COMPENSATORY DAMAGES:

1. “In accord with the foregoing, Plaintiff claim damages against Defendant as follows:”

A. Compensatory Damages: TOTAL = Approximately \$5,000 for Food and Drink Purchased (NOT INCLUDED):

(i) “Cost for Medicine for Food Poisoning – Approximately \$50.00

Note: The Plaintiff reserves the right to amend the compensatory (which was not added in) and the amounts for Intentional Infliction of Emotional Distress as a *Prima Facie* Case.

B. DAMAGES: SIX-HUNDRED MILLION DOLLARS for: Count 1:

Intentional Infliction of Emotional Distress and Claim I: Punitive Damages.

Damages - means the amount of compensation the Plaintiff is seeking in Count I:

Intentional Infliction of Emotional Distress; and Claim I: Punitive Damages as a *Prima Facie* Case.


JURY DEMANDED

2. Trial by jury is demanded.

WHEREFORE, Plaintiff demands judgment against the defendant, in the TOTAL amount of SIX-HUNDRED MILLION DOLLARS Intentional Infliction of Emotional Distress – \$300-MILLION; and Claim I: Punitive Damages - \$300-

MILLION as a *Prima Facie* Case and/or whatever else the Court deem appropriate.

Respectfully Yours,



Dora L. Adkins, *pro se*

Dora L. Adkins  
P.O. Box 3825  
Merrifield, Virginia 22116  
DoraAdkins7@aol.com  
No Telephone

**Note:** There is no way to contact the Plaintiff; except, by U.S. Mail to the above address because there is no working telephone number(s) to provide.

**CERTIFICATE OF SERVICE:**

I certify that on November 17, 2020, I filed a "Complaint" along with the listed Exhibits and Emails against the Defendant, Starbucks Corporation.

**ADDRESS OF DEFENDANT:**  
STARBUCKS CORPORATION,  
Registered Agent/Registered Office  
100 Shockoe Slip Fl 2  
Richmond, VA, 23219 - 4100, USA

**PRINCIPLE OFFICE:**  
2401 Utah Avenue South  
Seattle, WA 98134-1436  
206-447-1575

206 682-7570

**PHYSICAL ADDRESS:** (last two Starbucks Stores mentioned in the pleadings of this Complaint)

Starbucks Store #7631  
2407 Centerville Rd. Ste. B  
Centerville, VA  
(571) 643-0240

Starbucks Store #7703  
11610 Plaza America Dr.  
Reston, VA  
(703) 481-3485

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Dora L. Adkins". The signature is fluid and cursive, with the first name "Dora" being more prominent.

Dora L. Adkins, *pro se*

**EXHIBITS:**

**EXHIBIT #1:** Copy of Business Entity Details for Starbucks Corporation, Proof of Diversity

**EXHIBIT #2:** Copy of Letter (in the form of an Email) Mailed to Kevin Johnson, CEO

**EXHIBIT #3:** Copies of Contract Agreement Between Plaintiff, Dora L. Adkins, and Starbucks, Dated, October 2020 through October 2018, in the form of Receipts for Plaintiff's Purchases for Accommodations

**EXHIBIT #4:** Copy of Business Cards from Starbucks including the Three District Managers for Starbucks

**EMAILS:**

**EMAIL #1:** EMAIL TO SELF REGARDING TRIP TO STARBUCKS  
LOCATED IN RESTON, VA ON SUNDAY, NOVEMBER 15, 2020  
Sun, Nov 15, 2020 3:01 pm

**EMAIL #2:** EMAIL TO SELF REGARDING MY TRIP TO STARBUCKS  
LOCATED IN HERNDON, VA IN THE SHOPPING CENTER WITH  
MARRIOTT HOTEL  
Mon, Nov 2, 2020 1:07 pm

**EMAIL #3:** EMAIL TO SELF REGARDING MY TRIP TO STARBUCKS  
LOCATED IN HERNDON, VA  
Mon, Nov 2, 2020 9:15 am

**EMAIL #4:** EMAIL TO SELF REGARDING MY TRIP TO STARBUCKS  
LOCATED IN RESTON, VA  
Tue, Oct 27, 2020 9:45 pm

**EMAIL #5:** EMAIL TO SELF REGARDING ATTEMPTED FOOD  
POISONING AND/OR FOOD CONTAMINATION AT STARBUCKS  
LOCATED GATEHOUSE & GALLOWS, FALLS CHURCH, VA 22042  
Sun, Sept. 6, 2020 5:44 pm

**EMAIL #6:** EMAIL TO SELF REGARDING FOOD POISONING AND/OR  
FOOD CONTAMINATION AT STARBUCKS  
Sun, Aug 16, 2020 11:40 am

**EMAIL #7:** CONFIDENTIAL EMAIL REGARDING FOOD POISONING  
AND/OR FOOD CONTAMINATION Copy of Email Sent to Three District  
Manager and the Reply from one District Manager  
Sun, Nov 1, 2020 10:44 am

**EMAIL #8:** ALLEGED FOOD POSIONING AND/OR FOOD  
CONTAMINATION AT STARBUCKS Copy of Email Sent to Kevin Johnson,  
CEO, (failed attempt)  
Tue, Oct 13, 2020 10:42 am

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

DORA L. ADKINS,

Plaintiff,

v. Civil Action No.:

STARBUCKS CORPORATION,

Defendant.

**CERTIFICATION**

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

Executed on November 17, 2020 (Date)

**OR**

Dora L. Adkins

(Name of Attorney)

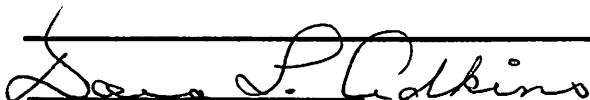
No Telephone Number

(Telephone Number of Attorney)

Prepared or assisted in preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

A handwritten signature in black ink, appearing to read "Dora L. Adkins", is written over a horizontal line.

Signature of Pro Se Party (Print or Type)

Executed on November 17, 2020 (Date)